

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN C. VOTTA JR.)
Plaintiff)

Civil Action No. 04-10135-GAO

v.)

PLAINTIFF'S MOTION IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT.

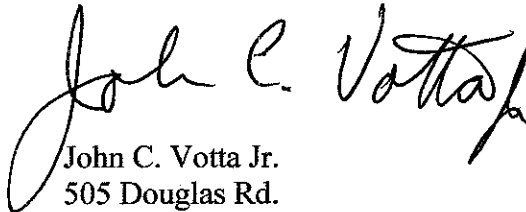
MARTHA COAKLEY)
Defendant)

Now comes the plaintiff in the above captioned matter and respectfully moves this Honorable Court to deny defendant's motion to dismiss plaintiff's amended complaint. For reason, plaintiff states that he does have cognizable federal and state claims and none of the defendant's defenses shield her from liability for her unlawful actions. Further, plaintiff relies on his memorandum of reasons in support of his motion in opposition which demonstrates a defeat to each of the defendant's defenses.

Local Rule 7.1(A)(2) Certificate

On April 13, 2004, plaintiff conferred with counsel for the defendant, David M. Lieber, in an attempt to narrow or resolve the issues.

Respectfully submitted,


John C. Votta Jr.
505 Douglas Rd.
Lowell, MA. 01852
978 459-8449

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon David M. Lieber, A.A.G., Criminal Bureau, One Ashburton Place, Boston, MA. 02108, by U.S. mail today.

Date:

4-22-04

Signed:

